

Exhibit 14

Ohio

Exhibit 14A

Meta's Proposal[s]

MDL 3047 – 2024-12-20 Agency Discovery JLB
Ohio – Meta Proposal

Search Terms: Meta has search term disputes with the following Ohio agencies: (i) Department of Children and Youth (“DCY”), (ii) Department of Education and Workforce (“DOE”), (iii) Department of Health (“DOH”), (iv) Department of Higher Education (“DHE”), (v) Department of Job and Family Services (“DJFS”), (vi) Department of Mental Health & Addiction Services (“DMHAS”), (vii) Department of Youth Services (“DYS”), (viii) Office of the Governor. Meta’s proposal involves using combinations of the search sets below

1. Search Set 1 (Social Media Terms) w/200 Search Set 6 (Youth Terms)
2. Search Set 2 (Harm Terms) w/200 Search Set 6 (Youth Terms)
3. Search Set 2 (Harm Terms) w/200 Search Set 3 (Alternate Causation Terms)
4. Search Set 4 (Mental Health/Wellbeing Terms) w/200 Search Set 6 (Youth Terms)
5. [[Search Set 1 (Social Media Terms)] w/50 [Search Set 5 (Other Case Terms)]]
OR [[Search Set 6 (Youth Terms)] w/50 [(Search Set 5 (Other Case Terms))]]

Search Set 1 – Social Media Terms

1.	(“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Netflix OR Reddit OR OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”)
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Search Set 2 – Harm Terms

2.	<p>(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “adverse childhood experience” OR “adverse childhood experiences” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)</p> <p><i>Department of Mental Health and Addiction Services can omit the highlighted terms in String 2, but then run them separately against Search Set 6 and Search Set 3 as per the below:</i></p> <p style="margin-left: 40px;">a) (wellness OR wellbeing OR well-being OR mental health OR treatment*) /25 Search Set 6 (Youth Terms)</p> <p style="margin-left: 40px;">b) (wellness OR wellbeing OR well-being OR mental health OR treatment*) /25 Search Set 3 (Alternate Causation Terms)</p>
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Search Set 3 – Alternate Causation Terms

5.	(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR (“sex traff*”)) <i>Department of Youth can omit String 5</i>
13.	(Covid* OR coronavirus OR pandemic OR quarantine OR “social* distanc*”)
14.	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)

Search Set 4 – Mental Health / Wellbeing Terms

3.	(“pro-ana” ((over OR excess*) w/3 diet*) OR anorexi* OR bulimi* OR orthorexi* OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)
4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator*)
6.	(addic* OR dopamine OR rabbithol* OR “social reward” OR “social approval” OR “screen time” OR screentime OR timespent OR “time spent” “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9.	(negative w/3 (appearance OR experience OR affect* OR effect*))
10.	(compar* w/5 (appearance OR social OR other* OR negative))
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))

Search Set 5 – Other Case Terms

15.	(policy OR policies OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR legislator OR advocacy OR lobby* OR suspend* OR revok* OR fine* OR sanction* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)
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Search Set 6 – Youth Terms

16.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) <i>Department of Education and the Workforce can omit the highlighted terms in String 16.</i>
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Custodians: Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Except for custodians designated with an asterisk (*), the custodians below have been affirmatively proposed by Ohio during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian
DCY	Jodi Norton
DCY	Nicole Sillaman
DCY	Kara Wente* (Director; former Director of Children’s Initiatives at the Governor’s Office)
DCY	Jeff Van Deusen* (Assistant Director)
DCY	Lily Clossman* (Children’s Initiatives Project Manager; former Children’s Initiatives Associate at the Governor’s Office)
DCY	Laura Graf* (Deputy Director, Policy)
DOE	Jessica Horowitz-Moore
DOE	Lacey Snoke
DOE	Jennifer Stump
DOH	Erica Wilson
DOH	Amadou Diallo
DOH	Ronda Merriman
DOH	Jennifer Voit

DOH	Sara Haig
DOH	Fern Miele
DOH	Travis Van Ness
DOH	Megan Smith
DHE	Mike Duffey
DHE	Jim Bennett
DHE	Jeff Robinson
DHE	Tom Sudkamp
DHE	Cheri Rice
DHE	Becky Stewart
DHE	Michelle Chavanne
DHE	Jana Fornario
DHE	Charles See
DHE	Kerry Soller
DHE	Carlos Bing
DJFS	Brandi Laser Seskes
DJFS	Aisha Boykin
DMHAS	Jennifer Bondurant
DMHAS	Jennifer Jarrell
DMHAS	Valerie Alloy
DMHAS	LeeAnne Cornyn* (Director; former Deputy Chief of Staff at the Governor's Office)
DYS	Ryan Smith
DYS	Andrew Janning
DYS	Jordan Argus

DYS	Gretchen Lapp
DYS	Chris Freeman
DYS	Corey Shrieve
DYS	Leah Garber
DYS	Anna Garver
DYS	Gary Grove
DYS	Aaron Mulvey
DYS	Benita Neeley
DYS	Ginine Trim
DYS	Yolonda Frierson
DYS	Ida Lewis
DYS	Kim Kent
DYS	Leslie Piatt
DYS	Anthony Panzino
DYS	Tereasa Moorman Jamison
DYS	Sarah Book
DYS	Ryan Gies
DYS	Julie Walburn
DYS	Tony Gottschlich
DYS	Jill Craig
Governor's Office	Scott Partika
Governor's Office	Marjorie Yano
Governor's Office	Giles Allen* (Director of Legislative Affairs)
Governor's Office	Christine Morrison* (Chief of Staff)

Governor's Office	Ann O'Donnell* (Chief Advisor to the Governor)
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Exhibit 14B

Ohio's Proposal[s]



DAVE YOST
OHIO ATTORNEY GENERAL

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MDL 3047

12-20-24 State Agency Discovery Dispute Joint Letter Briefing Cover Sheet

OHIO EXHIBITS

Ohio Exhibit 1A(1) – Department Of Education And Workforce hit counts and counterproposal for its three custodians provided to Meta on 12-19-24. This uses Meta’s proposed terms submitted on 12-11-24 but reduces the proximity limiter. Due to limitations in the agency’s IT infrastructure, the hit counts cannot be deduplicated without first pulling the documents.

Ohio Exhibit 1(A)(2) – Department of Job And Family Services hit counts and counterproposal for its one custodian of historical documents that the agency houses provided to Meta on 12-19-24. This uses Meta’s proposed terms submitted on 12-11-24 but reduced the proximity limiter and also removed the term “limit*” due to the unusually high hits this term brings for this agency. Due to limitations in the agency’s IT infrastructure, the hit counts cannot be deduplicated without first pulling the documents.

Ohio Exhibit 1(A)(3) – Department Of Youth Services hit counts and counterproposal for its 23 custodians provided to Meta on 12-19-24. This uses Meta’s proposed terms submitted on 12-11-24 but reduces the proximity limiter. Due to limitations in the agency’s IT infrastructure, the hit counts cannot be deduplicated without first pulling the documents.

Ohio Exhibit 1(A)(4) – 12-16-24 letter to Meta counsel providing the hit counts for nine Ohio agencies for Meta’s 12-11-24 proposed search terms as directed by Magistrate Judge Kang in the 12-11-24 DMC. This letter includes a targeted search request for the Office of Budget And Management (as explained in meet and confers with Meta) and a request for Meta to clarify what it seeks from the Department Of Health above and beyond the 1,034 documents that the agency has already produced pursuant to the R.45 subpoena that Meta issued it.

Ohio Exhibit 1(A)(5) – Department Of Health hit counts to Meta’s 12-11-24 proposal as attached to the 12-16-24 communication to Meta counsel. This is for its ten custodians. Due to

limitations in the agency's IT infrastructure, the hit counts cannot be deduplicated without first pulling the documents.

Ohio Exhibit 1(A)(6) – Office of the Governor hit counts to Meta's 12-11-24 proposal as attached to the 12-16-24 communication to Meta counsel. This is for its two custodians and reflects a deduplication amount.

Ohio Exhibit 1(A)(7) – Department of Education and Workforce hit counts to Meta's 12-11-24 proposal attached to the 12-16-24 communication to Meta counsel. This is for its three custodians. Due to limitations in the agency's IT infrastructure, the hit counts cannot be deduplicated without first pulling the documents.

Ohio Exhibit 1(A)(8) – Department of Children and Youth hit counts to Meta's 12-11-24 proposal for a sample custodian attached to the 12-16-24 communication to Meta counsel. Due to limitations in the agency's IT infrastructure, the hit counts cannot be deduplicated without first pulling the documents.

Ohio Exhibit 1(A)(9) – Department of Job and Family Services hit counts to Meta's 12-11-24 proposal for its one custodian of historical documents that the agency houses. Due to limitations in the agency's IT infrastructure, the hit counts cannot be deduplicated without first pulling the documents.

Ohio Exhibit 1(A)(10) – Department of Mental Health and Addiction Services hit counts to Meta's 12-11-24 attached to the 12-16-24 communication to Meta counsel. This is for one sample custodian. Due to limitations in the agency's IT infrastructure, the hit counts cannot be deduplicated without first pulling the documents.

Ohio Exhibit 1(A)(11) – Ohio search term counteroffer to Meta for all nine agencies provided to Meta counsel on 12-6-24.

Ohio Counter Proposal 12-6-24 Search Proposal for Ohio (META 12.5.2024)**SEARCHES**

1. Youth Use of Social Media: Search Set 1 (Social Media Terms) **AND-w/15** Search Set 6 (Youth Terms)
2. Youth Harm: Search Set 2 (Harm Terms) **AND-w/15** Search Set 6 (Youth Terms)
3. Alternate Causation: Search Set 2 (Harm Terms) **AND-w/15** Search Set 3 (Alternate Causation Terms)
4. Youth Mental Health/Wellbeing: Search Set 4 (Mental Health/Wellbeing Terms) **AND-w/15** Search Set 6 (Youth Terms)
5. Other Case Issues: [[Search Set 1 (Social Media Terms)] w/**1550** [Search Set 5 (Other Case Terms)]] **OR** [[Search Set 6 (Youth Terms)] w/**1550** [(Search Set 5 (Other Case Terms))]]

Search Set 1 – Social Media Terms

- | | |
|----|--|
| 1. | (“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap
OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest
YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”) |
|----|--|

Search Set 2 – Harm Terms

- | | |
|----|---|
| 2. | (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “adverse
childhood experience” OR “adverse childhood experiences” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR
“attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR
scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)

Department of Mental Health and Addiction Services can omit the highlighted terms in String 2, but then run them
 separately against Search Set 6 and Search Set 3 as per the below:

a) (wellness OR wellbeing OR well-being OR mental health OR treatment*) /25 Search Set 6 (Youth Terms)
b) (wellness OR wellbeing OR well-being OR mental health OR treatment*) /25 Search Set 3 (Alternate Causation
Terms) |
|----|---|

Search Set 3 – Alternate Causation Terms

5.	(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR (“sex traff*)) Department of Youth can omit String 5.
13.	(Covid* OR coronavirus OR pandemic OR quarantine OR “social* distanc*”)
14.	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)

Search Set 4 – Mental Health / Wellbeing Terms

3.	(“pro-ana” ((over OR excess*) w3 diet*) OR anorexi* OR bulimi* OR orthorexi* OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)
4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator*)
6.	(addic* OR dopamine OR rabbithol* OR “social reward” OR “social approval” OR “screen time” OR screentime OR timespent OR “time spent” OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agit* OR behav* OR insufficient OR depriv*))
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agit* OR behav* OR insufficient OR depriv*))
9.	(negative w/3 (appearance OR experience OR affect* OR effect*))
10.	(compar* w/5 (appearance OR social OR other* OR negative))
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))

Search Set 5 – Other Case Terms

15.	(policy OR policies OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR legislator OR advocacy OR lobby* OR suspend* OR revok* OR fine* OR sanction* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR
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	schem* OR exploit* OR trick* OR conceal* OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)
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<i>Search Set 6 – Youth Terms</i>	
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16.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)
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Exhibit 14C

Hit Reports



DAVE YOST

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December 16, 2024

Michael N. Kennedy, Esq.
Covington and Burling
One City Center
850 Tenth Street, NW
Washington D.C. 20001

VIA EMAIL ONLY

Re: MDL 3047 – Ohio/Meta

Dear Mike,

Per Magistrate Judge Kang's instructions in the December 11th, 2024 Discovery Management Conference with the Order following the conference having yet to be issued, the hit counts for the nine Ohio agencies as to Meta's December 11, 2024 search term proposal are as follows:

Office Of Budget And Management (OBM): this agency only had one hit (coming from Search 5) on a sample custodian. As has been explained to your colleagues in the past, OBM is simply an agency that oversees agency operating and capital budgets. I believe this agency is better treated for a "go get em" request, where it can produce documents related to Meta's Requests For Production 44 and 45. The identified custodians for OBM are all analysts who handle budget and expenditure requests from agencies throughout the state.

Department Of Health (DOH): DOH had 592,674 hits to Meta's latest search term proposal. The agency was able to break down these hits by both search and custodian in a document attached to the email including this letter. Further, on November 18, 2024, DOH produced 1,034 documents in response to the R. 45 subpoena you issued. If there are documents above and beyond what has already been produced that you can point to as something DOH can focus on, or limit the search terms accordingly, that will help complete this agency's production.

Ohio Governor: The Governor's office had 140,896 hit counts to Meta's 12-11-24 search term proposal. This number reflects a deduplication of documents. I have attached a document to the email including this letter that breaks down the hits per each search set and custodian and the amount of data related to these hits.

Department Of Education (DOE): DOE found 68,768 hits for Meta's 12-11-24 search term proposal. Please note that DOE had to remove the internal parentheses in Search Set 4, String 1 to avoid the system showing zero hits. I have attached a document to the email including this letter that breaks down the hits per each search set and custodian.

Department Of Children and Youth (DCY): DCY found 173,127 hits for Meta's 12-11-24 search term proposal. Search Set 4/String 1 reflects a total of zero hits for DCY's custodians, but the belief is that their system is not recognizing a portion of the proposal's syntax. I will supplement this total when it is finalized. I have attached a document to the email including this letter that breaks down the hits per each search set.

Department Of Job And Family Services (JFS): JFS found 120,936 hits for Meta's 12-11-24 proposal. I have attached a document to the email including this letter that breaks down the hits per each search set.

Mental Heath And Addiction Services (MHAS): MHAS found 174,486 hits for Meta's 12-11-24 proposal on just one of its three custodians. I have attached a document to the email including this letter that breaks down the hits per each search set and the amount of data related to these hits..

Higher Education And Workforce (ODHE): ODHE found 522,025 hits for Meta's 12-11-24 proposal over all of its identified custodians.

Department Of Youth Services (DYS): DYS found 2,763,716 hits for Meta's 12-11-24 proposal over all of its identified custodians.

Agencies are putting together counter proposals supported by hit counts that will be passed along to Meta ASAP. This letter only refers to hit counts for Meta's 12-11-24 proposal to satisfy Magistrate Judge Kang's direction at the 12-11-24 DMC with the order for that DMC not having been issued yet.

Ohio continues to reserve all rights without waiving Ohio's position that Magistrate Judge Kang's 9-6-24 Order is in error and that the States' Motion For Relief is still pending before Judge Gonzalez Rogers.

Very Truly Yours,

DAVE YOST
Attorney General

A handwritten signature in black ink, appearing to be 'DY', written over a horizontal line.

KEVIN R. WALSH
Senior Assistant Attorney General
Consumer Protection Section
Kevin.Walsh@OhioAttorneyGeneral.gov

META LITIGATION HIT COUNTS

Search #	Orig Search	Orig AND "Social media"	Orig w/3 "Social media"	Orig w/5 "Social media"	Rerun Orig Search with 2015 timeframe
1	130,060	n/a	n/a	n/a	102,911
2	161,114		48,307	25	482
3	23,469		11,316	21	459
4	35,590		15,853	9	453
5	82,786			15	461
6	4,927			2	442
7	17			11	5
8	2			2	2
9	0			0	0
10	473			8	469
11	0			0	0
12	0			0	0
13	55,489			8	447
14	80,178			29	466
15	528,629			41	484
16	485,061			40	490
TOTALS	1,587,795			211	4,660
					1,331,547

** Search #1 is "Social media" terms

NOTE: The Department did not run all of the original searches with the "Social media" terms with AND as a connective

Orig w/3 "Social media" within 2015	Orig w/5 "Social media" within 2015
n/a	n/a
24	464
21	446
8	444
13	450
2	2
11	5
2	2
0	0
8	456
0	0
0	0
7	447
26	456
39	466
38	472
199	4110

NOTE: Didn't run for w/5 and w/3 "Social Media"

NOTE: Didn't run for w/5 and w/3 "Social Media"

NOTE: Didn't run for w/5 and w/3 "Social Media"

NOTE: Didn't run for w/5 and w/3 "Social Media"

ctor due to the volume of the first few searches.

META LITIGATION HIT COUNTS

Search #	Orig Search	Orig AND "Covid"	Orig w/5 "Covid"	Orig AND "Substance Abuse"
2	161,114	24,549	446	18,378
3	23,469	5,573	442	7,050
4	35,590	8,700	442	10,457
5	82,786	14,635	445	17,346
6	4,927	2,358	439	2,823
7	17	5 n/a		6
8	2	0 n/a		2
9	0 n/a	n/a		n/a
10	473	442	442	446
11	0 n/a	n/a		n/a
12	0 n/a	n/a		n/a
15	528,629	48,239	446	25,228
TOTALS	837,007	104,501	3,102	81,736

** Search # 13 is "Covid" terms

** Search # 14 is "Substance abuse" terms

NOTE: All searches were only run on emails and for the 2015 - present timeframe

Orig w/5 "Substance Abuse"
450
443
442
444
n/a
n/a
n/a
446
n/a
n/a
451
2,676

META LITIGATION HIT COUNTS - email 12/5/2024

		Search removing "education" terms	Search removing "education" terms and child*
Youth Use of Social Media:	6,436	5,375	3,985
Youth Harm:	101,837	84,525	52,801
Alternate Causation:			
Search #2 and #5	26,107		
Search #2 and #13	22,271		
Search #2 and #14	18,029		
Youth Mental Health/Wellbeing:			
Original Search #3	16,809	15,189	
Original Search #4	27,314		
Original Search #6	4,669		
**Original Search #7	17		
**Original Search #8	2		
**Original Search #9	0		
**Original Search #10	473		
**Original Search #11	0		
**Original Search #12	0		
*Other Case Issues:	0		
TOTALS:			

* I replaced "w/50" with NEAR(50) given the necessary terminology for Microsoft Purview

** For these I did not run the original search (i.e. just those initial terms) since they were already a

NOTE: These searches were run from 1/1/2015 - present

NOTE: These do not include deduping

Using NEAR(50) instead of AND	Using NEAR(25) instead of AND
659	295
75,811	65,354
10,640	7,991
8,692	6,503
7,749	6,509
11,269	10,005
20,999	18,930
803	603
17	17
2	2
0	0
473	473
0	0
0	0
0	0
137,114	116,682

	Total search as asked	Custodian #1 (JHM)	Custodian #2 (LS)	Custodian #3 (JS)
Social Media Terms	21,824	4,232	13,987	3,605
Youth Harm Terms	41,420	11,282	17,582	12,556

**Harm with Alternate
Causation**

#2 NEAR(200) #5	16,860	4,815	5,777	6,268
#2 NEAR(200) #13	13,913	3,966	5,288	4,659
#2 NEAR(200) #14	11,399	2,322	3,569	5,508

**Mental
Health/Wellbeing
with Youth**

* NOTE: Removed internal parenthetical from #3, otherwise

#3 NEAR(200) #16	6,973	2,328	2,082	2,563	resulted in 0 results
#4 NEAR(200) #16	9,032	2,762	3,260	3,010	
#6 NEAR(200) #16	8,116	2,765	2,111	3,240	
#7	17	5	11	1	*NOTE: When search run NEAR(200) #16 there are 0 results
#8	2	0	1	1	*NOTE: When search run NEAR(200) #16 there are 0 results
#9	0				
#10 NEAR(200) #16	8	0	8	0	
#11	0				
#12	0				
Other Case Terms	68,768	14,128	30,041	24,599	

** NOTE: All searches run from 1/1/2015 through present

	Total search for NEAR(25)	Custodian #1 (JHM)	Custodian #2 (LS)	Custodian #3 (JS)	
Social Media Terms	5,356	1,310	3,027	1,019	
Youth Harm Terms	19,884	6,395	7,783	5,706	
Harm with Alternate Causation					
#2 NEAR(25) #5	7,996	2,406	2,534	3,056	
#2 NEAR(25) #13	6,494	2,058	2,467	1,969	
#2 NEAR(25) #14	6,509	1,353	1,797	3,359	
Mental Health/Wellbeing with Youth					
#3 NEAR(25) #16	4,135	1,507	1,009	1,619	* NOTE: Removed internal parenthetical from #3, otherwise
#4 NEAR(25) #16	3,523	1,189	1,344	990	
#6 NEAR(25) #16	3,036	934	889	1,213	
#7	17	5	11	1	*NOTE: When search run NEAR(25) #16 there are 0 results
#8	2	0	1	1	*NOTE: When search run NEAR(25) #16 there are 0 results
#9	0				
#10 NEAR(25) #16	0				*NOTE: When search run NEAR(200) #16 there are 8 results
#11	0				
#12	0				
Other Case Terms	52,873	10,875	21,981	20,017	*NOTE: Used NEAR(25) in place of NEAR(50)

** NOTE: All searches run from 1/1/2015 through present

/ise resulted in 0

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ults.

	NEAR/25	NEAR/25 Without “Limit*”
Search 1	8 items (85.83 MB)	8 items (85.83 MB)
Search 2	13,583 items (82.23 GB)	13,583 items (82.23 GB)
Search 3	7,313 items (53.37 GB)	7,313 items (53.37 GB)
Search 4	2,489 items (25.01 GB)	2,489 items (25.01 GB)
Search 5	83,571 items (210.58 GB)	19,489 items (103.28 GB)

Meta Revised Search 12.11.24

Location type	Part	Condition
Exchange	Primary	(((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta") OR ("Youtube") OR ("Snapchat") OR ("Snap") OR ("Bytedance") OR ("TikTok") OR ("Twitter") OR ("Tweet") OR ("Netflix") OR ("Reddit") OR ("finsta") OR ("FB") OR ("IG") OR ("YT") OR ("TT") OR (DM*) OR ("direct message")))) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under- age") OR (juvenile*) OR ("pre-teen") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z")) OR ("gen-z") OR (((gen*) NEAR(1) ("alpha")) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*))))) OR (((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("mental health") OR ("TMH") OR ("adverse childhood experience") OR ("adverse childhood experiences") OR (anxi*) OR (anti-anxi*) OR (depress*) OR (antidepress*) OR ("attention deficit") OR ("ADHD") OR ("posttraumatic") OR ("bi-polar") OR ("bi polar") OR ("bipolar") OR ("BPD") OR ("insomnia") OR (scar*) OR ("afraid") OR ("angry") OR ("mad") OR (worr*) OR (lonel*) OR ("alone") OR (therap*) OR (counsel*) OR (treatment*)) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under-age") OR (juvenile*) OR ("pre-teen") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z")) OR ("gen-z") OR (((gen*) NEAR(1) ("alpha")) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*))))) OR (((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("mental health") OR ("TMH") OR ("adverse childhood experience") OR ("adverse childhood experiences") OR (anxi*) OR (anti-anxi*) OR (depress*) OR (antidepress*) OR ("attention deficit") OR ("ADHD") OR ("posttraumatic") OR ("bi-polar") OR ("bi polar") OR ("bipolar") OR ("BPD") OR ("insomnia") OR (scar*) OR ("afraid") OR ("angry") OR ("mad") OR (worr*) OR (lonel*) OR ("alone") OR (therap*) OR (counsel*) OR (treatment*)))))
Exchange	Unindexed	Unindexed Items
Exchange	Keyword	(((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta") OR ("Youtube") OR ("Snapchat") OR ("Snap") OR ("Bytedance") OR ("TikTok") OR ("Twitter") OR ("Tweet") OR ("Netflix") OR ("Reddit") OR ("finsta") OR ("FB") OR ("IG") OR ("YT") OR ("TT") OR (DM*) OR ("direct message")))) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under- age") OR (juvenile*) OR ("pre-teen") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z")) OR ("gen-z") OR (((gen*) NEAR(1) ("alpha")) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*))))) AND (received>="01-Jan-2012 00:00:00 AM"))

Exchange	Keyword	<p> ((((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("mental health") OR ("TMH") OR ("adverse childhood experience") OR ("adverse childhood experiences") OR (anxi*) OR (anti-anxi*) OR (depress*) OR (antidepress*) OR ("attention deficit") OR ("ADHD") OR ("posttraumatic") OR ("bi-polar") OR ("bi polar") OR ("bipolar") OR ("BPD") OR ("insomnia") OR (scar*) OR ("afraid") OR ("angry") OR ("mad") OR (worr*) OR (lonel*) OR ("alone") OR (therap*) OR (counsel*) OR (treatment*))) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under-age") OR (juvenile*) OR ("pre-teen*") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z")) OR ("gen-z") OR (((("gen") NEAR(1) ("alpha")) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*)))))) AND (received>="01-Jan-2012 00:00:00 AM")) </p>
Exchange	Keyword	<p> ((((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("mental health") OR ("TMH") OR ("adverse childhood experience") OR ("adverse childhood experiences") OR (anxi*) OR (anti-anxi*) OR (depress*) OR (antidepress*) OR ("attention deficit") OR ("ADHD") OR ("posttraumatic") OR ("bi-polar") OR ("bi polar") OR ("bipolar") OR ("BPD") OR ("insomnia") OR (scar*) OR ("afraid") OR ("angry") OR ("mad") OR (worr*) OR (lonel*) OR ("alone") OR (therap*) OR (counsel*) OR (treatment*))) NEAR(200) (((Covid*) OR ("coronavirus") OR ("pandemic") OR ("quarantine") OR (((social*) NEAR(1) (distanc*)))))) AND (received>="01-Jan-2012 00:00:00 AM")) </p>
Exchange	Keyword	<p> ((((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("mental health") OR ("TMH") OR ("adverse childhood experience") OR ("adverse childhood experiences") OR (anxi*) OR (anti-anxi*) OR (depress*) OR (antidepress*) OR ("attention deficit") OR ("ADHD") OR ("posttraumatic") OR ("bi-polar") OR ("bi polar") OR ("bipolar") OR ("BPD") OR ("insomnia") OR (scar*) OR ("afraid") OR ("angry") OR ("mad") OR (worr*) OR (lonel*) OR ("alone") OR (therap*) OR (counsel*) OR (treatment*))) NEAR(200) (((svap*) OR ("ecig") OR ("e-cig") OR (cig*) OR (smok*) OR ("nicotine") OR ("tobacco") OR ("pot") OR ("cannabis") OR ("marijuana") OR ("heroin") OR ("crack") OR ("cocaine") OR (fent*) OR (opio*) OR (opia*) OR ("meth") OR ("methamphetamine") OR ("oxy") OR ("oxycontin") OR (painkiller*) OR (narcotic*) OR (drug*) OR (alcohol*) OR ("Juul")))) AND (received>="01-Jan-2012 00:00:00 AM")) </p>

Exchange	Keyword	<p> ((((("pro-ana") OR (((("over") OR (excess*))) NEAR(3) (diet*))) OR (anorexi*) OR (bulimi*) OR (orthorexi*) OR (dysmorph*) OR ("binge") OR ("purge") OR (suicid*) OR ("self harm") OR ("self-harm") OR ("selfharm") OR ("unalive") OR (cutting*))) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under-age") OR (juvenile*) OR ("pre-teen*") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z"))) OR ("gen-z") OR (((("gen") NEAR(1) ("alpha")))) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*)))))) AND (received>="01-Jan-2012 00:00:00 AM")) </p>
Exchange	Keyword	<p> ((((("bully") OR (bullie*) OR (cyberbull*) OR (harass*) OR (sextort*) OR (transphob*) OR (homophob*) OR (racis*) OR (sexis*) OR (groom*) OR (hookup*) OR (solicit*) OR (pedophil*) OR (predator*))) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under-age") OR (juvenile*) OR ("pre-teen*") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z"))) OR ("gen-z") OR (((("gen") NEAR(1) ("alpha")))) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*)))))) AND (received>="01-Jan-2012 00:00:00 AM")) </p>
Exchange	Keyword	<p> ((((((((("addic") OR ("dopamine") OR (rabbithol*) OR ("social reward") OR ("social approval") OR ("screen time") OR ("screentime") OR ("timespent") OR ("time spent")))) AND (((("mandatory break") OR ("limiting tool") OR ("habit loop") OR ("operant conditioning") OR ("impulse control"))))) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under-age") OR (juvenile*) OR ("pre-teen*") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z"))) OR ("gen-z") OR (((("gen") NEAR(1) ("alpha")))) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*)))))) AND (received>="01-Jan-2012 00:00:00 AM")) </p>
Exchange	Keyword	<p> ((((("eat") NEAR(3) (((problem*) OR (issue*) OR (trouble*) OR (difficult*) OR (disorder*) OR (disab*) OR (agitat*) OR (behav*) OR ("insufficient") OR (depriv*)))))) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under-age") OR (juvenile*) OR ("pre-teen*") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z"))) OR ("gen-z") OR (((("gen") NEAR(1) ("alpha")))) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*)))))) AND (received>="01-Jan-2012 00:00:00 AM")) </p>

Exchange	Keyword	((((((sleep*) NEAR(3) (((problem*) OR (issue*) OR (trouble*) OR (difficult*) OR (disorder*) OR (disab*) OR (agitat*) OR (behav*) OR ("insufficient") OR (depriv*)))) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under-age") OR (juvenile*) OR ("pre-teen*") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z")) OR ("gen-z") OR (((("gen") NEAR(1) ("alpha")) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*)))))) AND (received>="01-Jan-2012 00:00:00 AM"))
Exchange	Keyword	((((("negative") NEAR(3) (((("appearance") OR ("experience") OR (affect*) OR (effect*)))) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under-age") OR (juvenile*) OR ("pre-teen*") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z")) OR ("gen-z") OR (((("gen") NEAR(1) ("alpha")) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*)))))) AND (received>="01-Jan-2012 00:00:00 AM"))
Exchange	Keyword	((((((compar*) NEAR(5) (((("appearance") OR ("social") OR (other*) OR ("negative")))) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under-age") OR (juvenile*) OR ("pre-teen*") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z")) OR ("gen-z") OR (((("gen") NEAR(1) ("alpha")) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*)))))) AND (received>="01-Jan-2012 00:00:00 AM"))
Exchange	Keyword	((((("body") NEAR(3) (((accept*) OR ("dissatisfaction") OR (positiv*) OR ("image") OR (dysmorph*)))) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under-age") OR (juvenile*) OR ("pre-teen*") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z")) OR ("gen-z") OR (((("gen") NEAR(1) ("alpha")) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*)))))) AND (received>="01-Jan-2012 00:00:00 AM"))
Exchange	Keyword	((((("self") NEAR(3) (((("esteem") OR ("harm") OR ("control") OR (injur*) OR (mutilat*) OR (regulat*)))) NEAR(200) (((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under-age") OR (juvenile*) OR ("pre-teen*") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z")) OR ("gen-z") OR (((("gen") NEAR(1) ("alpha")) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*)))))) AND (received>="01-Jan-2012 00:00:00 AM"))

Exchange	Keyword	((((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta") OR ("Youtube") OR ("Snapchat") OR ("Snap") OR ("Bytedance") OR ("TikTok") OR ("Twitter") OR ("Tweet") OR ("Netflix") OR ("Reddit") OR ("finsta") OR ("FB") OR ("IG") OR ("YT") OR ("TT") OR (DM*) OR ("direct message")))) NEAR(50) (((("policy") OR ("policies") OR (practice*) OR ("presentation") OR (assembl*) OR (initiative*) OR (interven*) OR (prevent*) OR (limit*) OR (control*) OR ("legislation") OR ("legislator") OR ("advocacy") OR (lobby*) OR (suspend*) OR (revok*) OR (fine*) OR (sanction*) OR ("law enforcement") OR ("deceptive") OR (decei*) OR (fraud*) OR (defraud*) OR (cheat*) OR (lie*) OR (misrepresent*) OR (mislead*) OR (schem*) OR (exploit*) OR (trick*) OR (conceal*) OR (omit*) OR (downplay*) OR (suppress*) OR ("cover up") OR ("Consumer Protection Act") OR ("consumer protection")))))) OR ((((teen*) OR (tween*) OR (adolescen*) OR (kid*) OR (youth*) OR (minor*) OR (young*) OR (child*) OR (underage*) OR ("under-age") OR (juvenile*) OR ("pre- teen*") OR (preteen*) OR ("U18") OR ("under 18") OR ("U13") OR ("under 13") OR (((gen*) NEAR(1) ("z")))) OR ("gen-z") OR (((("gen") NEAR(1) ("alpha")))) OR (gen-a*) OR (scholar*) OR (School*) OR (student*) OR (pupil*) OR (grade*)) NEAR(50) (((("policy") OR ("policies") OR (practice*) OR ("presentation") OR (assembl*) OR (initiative*) OR (interven*) OR (prevent*) OR (limit*) OR (control*) OR ("legislation") OR ("legislator") OR ("advocacy") OR (lobby*) OR (suspend*) OR (revok*) OR (fine*) OR (sanction*) OR ("law enforcement") OR ("deceptive") OR (decei*) OR (fraud*) OR (defraud*) OR (cheat*) OR (lie*) OR (misrepresent*) OR (mislead*) OR (schem*) OR (exploit*) OR (trick*) OR (conceal*) OR (omit*) OR (downplay*) OR (suppress*) OR ("cover up") OR ("Consumer Protection Act") OR ("consumer protection")))))))) AND (received>="01-Jan-2012 00:00:00 AM"))
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Revised Search excl. DYS Nos.

Revised Search (Near 100
excl. DYS Nos.

Items	Size (MB)	Size (GB)	Items	Size (MB)	Size (GB)	Items	Size (MB)
1,032,883	413,317.12	413.32	679,180	232,448.00	232.45	580,729	212,531.20

369,879	252,774.40	252.77	232,844	126,535.68	126.54	216,894	120,514.56
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58,978	43,970.56	43.97	42,685	22,149.12	22.15	34,602	18,667.76
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75,260	87,603.20	87.60	47,811	37,611.52	37.61	42,136	33,505.28
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54,668	58,071.04	58.07	30,793	27,033.60	27.03	28,403	25,395.20
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60,656	69,980.16	69.98	39,534	34,078.72	34.08	34,941	31,641.60
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213	667.95	0.67	136	166.68	0.17	98	70.01
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2,318	7,352.32	7.35	1,633	4,720.64	4.72	1,470	4,577.28
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3,437	10,219.52	10.22	1,711	4,925.44	4.93	1,592	4,689.92
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2,704	8,243.20	8.24	1,557	3,563.52	3.56	1,397	3,256.32
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5,139	11,520.00	11.52	3,023	4,935.68	4.94	2,641	4,536.32
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526	1,208.32	1.21	333	406.74	0.41	276	317.52
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25,721	41,441.28	41.44	13,470	19,415.04	19.42	12,733	18,227.20
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598,838	315,320.32	315.32	399,436	170,885.12	170.89	320,167	151,961.60
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/Near 25) DYS Counter Proposal - Revised Search
(Near 50/Near 25) exc. DYS Nos.

Size (GB)	Items	Size (MB)	Size (GB)
212.53	138,308	62,074.88	62.07
32.55	14,310	33,064.96	33.06
66.38	169,250	53,176.32	53.18

120.51	196,000	112,476.16	112.48
18.67	27,532	13,987.84	13.99
33.51	36,548	29,634.56	29.63

25.40	25,139	23,633.92	23.63
31.64	30,101	28,180.48	28.18
0.07	43	57.94	0.06
4.58	1,077	3,932.16	3.93

4.69	1,148	3,399.68	3.40
3.26	2,234	7,096.32	7.10
4.54	2,660	4,608.00	4.61
0.32	237	302.07	0.30
18.23	11,448	16,988.16	16.99

151.96	323,510	154,992.64	154.99
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[illegible]

Condition

(((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta") O

Unindexed Items

(((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta") OR
 (((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("menta
 (((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("menta
 (((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("menta
 (((("pro-ana") OR (((("over") OR (excess*)) NEAR(3) (diet*)) OR (anorexi*) OR (bulimi*) OR (orthorexi*)
 (((("bully") OR (bullie*) OR (cyberbull*) OR (harass*) OR (sextort*) OR (transphob*) OR (homophob*) O
 ((((((addic*) OR ("dopamine") OR (rabbithol*) OR ("social reward") OR ("social approval") OR ("screen ti
 (((((eat*) NEAR(3) (((problem*) OR (issue*) OR (trouble*) OR (difficult*) OR (disorder*) OR (disab*) OR
 (((((sleep*) NEAR(3) (((problem*) OR (issue*) OR (trouble*) OR (difficult*) OR (disorder*) OR (disab*) C
 (((("negative") NEAR(3) (((("appearance") OR ("experience") OR (affect*) OR (effect*))))) NEAR(200) (((te
 (((((compar*) NEAR(5) (((("appearance") OR ("social") OR (other*) OR ("negative"))))) NEAR(200) (((teen'
 ((((("body") NEAR(3) (((accept*) OR ("dissatisfaction") OR (positiv*) OR ("image") OR (dysmorph*))))) NE
 ((((("self") NEAR(3) (((("esteem") OR ("harm") OR ("control") OR (injur*) OR (mutilat*) OR (regulat*))))) NE
 ((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta") O

Locations with hits	Items	Size (MB)	Size (GB)
24	1,032,883	413,317.12	413.32
24	14,201	32,460.80	32.46
24	458,295	148,090.88	148.09
24	369,879	252,774.40	252.77
24	58,978	43,970.56	43.97
24	75,260	87,603.20	87.60
24	54,668	58,071.04	58.07
24	60,656	69,980.16	69.98
24	213	667.95	0.67
24	2,318	7,352.32	7.35
24	3,437	10,219.52	10.22
24	2,704	8,243.20	8.24
24	5,139	11,520.00	11.52
24	526	1,208.32	1.21
24	25,721	41,441.28	41.44
24	598,838	315,320.32	315.32

[illegible]

Condition

((((((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta")

Unindexed Items

((((((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta") O
 (((((((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("ment
 (((((((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("ment
 (((((((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("ment
 (((((((("pro-ana") OR (((("over") OR (excess*)) NEAR(3) (diet*)) OR (anorexi*) OR (bulimi*) OR (orthorex
 (((((((("bully") OR (bullie*) OR (cyberbull*) OR (harass*) OR (sextort*) OR (transphob*) OR (homophob*)
 (((((((((((("addic") OR ("dopamine") OR (rabbithol*) OR ("social reward") OR ("social approval") OR ("screen
 (((((((("eat") NEAR(3) (((("problem") OR (issue*) OR (trouble*) OR (difficult*) OR (disorder*) OR (disab*) OI
 (((((((("sleep") NEAR(3) (((("problem") OR (issue*) OR (trouble*) OR (difficult*) OR (disorder*) OR (disab*)
 (((((((("negative") NEAR(3) (((("appearance") OR ("experience") OR (affect*) OR (effect*)))))) NEAR(200) (((
 (((((((("compar") NEAR(5) (((("appearance") OR ("social") OR (other*) OR ("negative"))))) NEAR(200) (((tee
 (((((((("body") NEAR(3) (((("accept") OR ("dissatisfaction") OR (positiv*) OR ("image") OR (dysmorph*)))))) †
 (((((((("self") NEAR(3) (((("esteem") OR ("harm") OR ("control") OR (injur*) OR (mutilat*) OR (regulat*)))))) †
 (((((((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta")

Locations with hits	Items	Size (MB)	Size (GB)
24	679,180	232,448.00	232.45
24	14,223	32,542.72	32.54
24	294,538	78,510.08	78.51
24	232,844	126,535.68	126.54
24	42,685	22,149.12	22.15
24	47,811	37,611.52	37.61
24	30,793	27,033.60	27.03
24	39,534	34,078.72	34.08
24	136	166.68	0.17
24	1,633	4,720.64	4.72
24	1,711	4,925.44	4.93
24	1,557	3,563.52	3.56
24	3,023	4,935.68	4.94
24	333	406.74	0.41
24	13,470	19,415.04	19.42
24	399,436	170,885.12	170.89

[illegible]

Condition

((((((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta")

Unindexed Items

((((((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta") O
 (((((((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("ment
 (((((((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("ment
 (((((((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("ment
 (((((((("pro-ana") OR (((("over") OR (excess*)) NEAR(3) (diet*)) OR (anorexi*) OR (bulimi*) OR (orthorex
 (((((((("bully") OR (bullie*) OR (cyberbull*) OR (harass*) OR (sextort*) OR (transphob*) OR (homophob*)
 (((((((((((("addic") OR ("dopamine") OR (rabbithol*) OR ("social reward") OR ("social approval") OR ("screen
 (((((((("eat") NEAR(3) (((("problem") OR (issue*) OR (trouble*) OR (difficult*) OR (disorder*) OR (disab*) OI
 (((((((("sleep") NEAR(3) (((("problem") OR (issue*) OR (trouble*) OR (difficult*) OR (disorder*) OR (disab*)
 (((((((("negative") NEAR(3) (((("appearance") OR ("experience") OR (affect*) OR (effect*)))))) NEAR(100) (((
 (((((((("compar") NEAR(5) (((("appearance") OR ("social") OR (other*) OR ("negative"))))) NEAR(100) (((tee
 (((((((("body") NEAR(3) (((("accept") OR ("dissatisfaction") OR (positiv*) OR ("image") OR (dysmorph*)))))) †
 (((((((("self") NEAR(3) (((("esteem") OR ("harm") OR ("control") OR (injur*) OR (mutilat*) OR (regulat*)))))) †
 (((((((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta")

Locations with hits	Items	Size (MB)	Size (GB)
24	580,729	212,531.20	212.53
24	14,228	32,552.96	32.55
24	238,777	66,375.68	66.38
24	216,894	120,514.56	120.51
24	34,602	18,667.76	18.67
24	42,136	33,505.28	33.51
24	28,403	25,395.20	25.40
24	34,941	31,641.60	31.64
24	98	70.01	0.07
24	1,470	4,577.28	4.58
24	1,592	4,689.92	4.69
24	1,397	3,256.32	3.26
24	2,641	4,536.32	4.54
24	276	317.52	0.32
24	12,733	18,227.20	18.23
24	320,167	151,961.60	151.96

[illegible]

Condition

((((((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta")

Unindexed Items

((((((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta") O
 (((((((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("ment
 (((((((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("ment
 (((((((("wellness") OR ("wellbeing") OR ("well-being") OR ("confidence") OR ("self-confidence") OR ("ment
 (((((((("pro-ana") OR (((("over") OR (excess*)) NEAR(3) (diet*)) OR (anorexi*) OR (bulimi*) OR (orthorex
 (((((((("bully") OR (bullie*) OR (cyberbull*) OR (harass*) OR (sextort*) OR (transphob*) OR (homophob*)
 (((((((((((("addic") OR ("dopamine") OR (rabbithol*) OR ("social reward") OR ("social approval") OR ("screen
 (((((((("eat") NEAR(3) (((("problem") OR (issue*) OR (trouble*) OR (difficult*) OR (disorder*) OR (disab*) OI
 (((((((("sleep") NEAR(3) (((("problem") OR (issue*) OR (trouble*) OR (difficult*) OR (disorder*) OR (disab*)
 (((((((("negative") NEAR(3) (((("appearance") OR ("experience") OR (affect*) OR (effect*))))) NEAR(50) (((tee
 (((((((("compar") NEAR(5) (((("appearance") OR ("social") OR (other*) OR ("negative"))))) NEAR(100) (((tee
 (((((((("body") NEAR(3) (((("accept") OR ("dissatisfaction") OR (positiv*) OR ("image") OR (dysmorph*)))))
 (((((((("self") NEAR(3) (((("esteem") OR ("harm") OR ("control") OR (injur*) OR (mutilat*) OR (regulat*)))))
 (((((((((((("social media") OR ("social network") OR ("Meta") OR ("Facebook") OR ("Instagram") OR ("Insta")

Locations with hits	Items	Size (MB)	Size (GB)
11	138,308	62,074.88	62.07
11	14,310	33,064.96	33.06
11	169,250	53,176.32	53.18
11	196,000	112,476.16	112.48
11	27,532	13,987.84	13.99
11	36,548	29,634.56	29.63
11	25,139	23,633.92	23.63
11	30,101	28,180.48	28.18
11	43	57.94	0.06
11	1,077	3,932.16	3.93
11	1,148	3,399.68	3.40
11	2,234	7,096.32	7.10
11	2,660	4,608.00	4.61
11	237	302.07	0.30
11	11,448	16,988.16	16.99
11	323,510	154,992.64	154.99

Location	Location type	Items	Size
Sara.Haig@odh.ohio.gov	Exchange	23440	22945862779
Megan.Smith@odh.ohio.gov	Exchange	13931	16546361508
erica.wilson@odh.ohio.gov	Exchange	10410	27992449352
Amadou.Diallo@odh.ohio.gov	Exchange	6315	15977278341
Jennifer.Voit@odh.ohio.gov	Exchange	5948	13894219203
.Fern.Miele@ood.ohio.gov	Exchange	5318	3242700308
Ronda.Merriman@odh.ohio.gov	Exchange	4522	5390183956
Fern.Miele@odh.ohio.gov	Exchange	3024	9620726743
Travis.VanNess@odh.ohio.gov	Exchange	2403	6528350290
.Amadou.Diallo@odh.ohio.gov	Exchange	2209	4520453079
.erica.wilson@odh.ohio.gov	Exchange	4	8462008.32

Location	Location type	Items	Size
Sara.Haig@odh.ohio.gov	Exchange	40831	36925981327
erica.wilson@odh.ohio.gov	Exchange	21133	53289806725
Jennifer.Voit@odh.ohio.gov	Exchange	16648	27305254584
Megan.Smith@odh.ohio.gov	Exchange	15878	20197083709
Amadou.Diallo@odh.ohio.gov	Exchange	12283	23396834345
.Fern.Miele@ood.ohio.gov	Exchange	10286	7419556004
Fern.Miele@odh.ohio.gov	Exchange	6018	18103287153
Ronda.Merriman@odh.ohio.gov	Exchange	5529	6635724472
Travis.VanNess@odh.ohio.gov	Exchange	5220	13797582438
.Amadou.Diallo@odh.ohio.gov	Exchange	2428	4831838208
.erica.wilson@odh.ohio.gov	Exchange	20	15193866.24

Location	Location type	Items	Size
erica.wilson@odh.ohio.gov	Exchange	24286	49832358052
Jennifer.Voit@odh.ohio.gov	Exchange	22394	31202937405
Sara.Haig@odh.ohio.gov	Exchange	21231	27187142984
Megan.Smith@odh.ohio.gov	Exchange	17851	20562155930
Amadou.Diallo@odh.ohio.gov	Exchange	15897	24910810317
.Fern.Miele@ood.ohio.gov	Exchange	9737	7677254042
Ronda.Merriman@odh.ohio.gov	Exchange	7247	6367289016
Travis.VanNess@odh.ohio.gov	Exchange	6185	12960063816
Fern.Miele@odh.ohio.gov	Exchange	5219	16986595656
.Amadou.Diallo@odh.ohio.gov	Exchange	2189	4015794422
.erica.wilson@odh.ohio.gov	Exchange	22	17752391.68

Location	Location type	Items	Size
Sara.Haig@odh.ohio.gov	Exchange	17742	24824910971
erica.wilson@odh.ohio.gov	Exchange	9190	27509265531
Jennifer.Voit@odh.ohio.gov	Exchange	7119	15290083574
Amadou.Diallo@odh.ohio.gov	Exchange	6064	13185549599
Megan.Smith@odh.ohio.gov	Exchange	5650	8955006812
.Fern.Miele@ood.ohio.gov	Exchange	2700	1943472701
Ronda.Merriman@odh.ohio.gov	Exchange	2368	3779571220
Travis.VanNess@odh.ohio.gov	Exchange	2251	7301444403
Fern.Miele@odh.ohio.gov	Exchange	2207	9899899617
.Amadou.Diallo@odh.ohio.gov	Exchange	689	1256277934
.erica.wilson@odh.ohio.gov	Exchange	15	10664017.92

Location	Location type	Items	Size
Sara.Haig@odh.ohio.gov	Exchange	52992	40501541601
erica.wilson@odh.ohio.gov	Exchange	31927	64037962383
Megan.Smith@odh.ohio.gov	Exchange	25038	27315992003
Jennifer.Voit@odh.ohio.gov	Exchange	20669	30129195581
Amadou.Diallo@odh.ohio.gov	Exchange	19042	30537217475
.Fern.Miele@ood.ohio.gov	Exchange	11972	8042326262
Fern.Miele@odh.ohio.gov	Exchange	9160	21109764260
Ronda.Merriman@odh.ohio.gov	Exchange	8138	9599251907
Travis.VanNess@odh.ohio.gov	Exchange	7623	16353087980
.Amadou.Diallo@odh.ohio.gov	Exchange	3992	5830418104
.erica.wilson@odh.ohio.gov	Exchange	40	16850616.32

MDL 3047 – 2024-12-09 Agency Discovery JLB**Ohio – Meta Proposal****(Meta revised 12.11.2024)****Hit Report 12-13-2024**

Search Terms: Meta made its most recent counterproposal on December 5, 2024 to the Ohio (i) Department of Children and Youth (“DCY”), (ii) Department of Education and Workforce (“DOE”), (iii) Department of Health (“DOH”), (iv) Department of Higher Education (“DHE”), (v) Department of Job and Family Services (“DJFS”), (vi) Department of Mental Health & Addiction Services (“DMHAS”), (vii) Department of Youth Services (“DYS”), (viii) Office of Budget and Management (“OMB”), (ix) Office of the Governor. Meta proposed a further narrowing to the Ohio Attorney General’s Office on December 6. Meta’s proposal involves using combinations of the search sets below

1. Search Set 1 (Social Media Terms) **w/200** Search Set 6 (Youth Terms)
 - a. Set 1
 - i. Marjorie – 8,746 (~10.15GB)
 - ii. Scott – 4,399 (~11.33GB)
 - iii. Both after Deconfliction – 11,530 (14.215GB)
2. Search Set 2 (Harm Terms) **w/200** Search Set 6 (Youth Terms)
 - a. Set 1
 - i. Marjorie – 18,779 (~17.36GB)
 - ii. Scott – 14,579 (~20.65GB)
 - iii. Both after Deconfliction
3. Search Set 2 (Harm Terms) **w/200** Search Set 3 (Alternate Causation Terms)
 - a. Set 1
 - i. Marjorie – 3,347 (~8.64GB)
 - ii. Scott – 6,316 (~13.61GB)
 - iii. Both after Deconfliction – 8,441 (15.129GB)
 - b. Set 2
 - i. Marjorie – 3,998 (~7.17GB)
 - ii. Scott – 6,949 (~12.09GB)
 - iii. Both after Deconfliction – 9,394 (13.199GB)
 - c. Set 3
 - i. Marjorie – 2,426 (~7.05GB)
 - ii. Scott – 7,643 (~13.88GB)
 - iii. Both after Deconfliction – 8,405 (14.147GB)
4. Search Set 4 (Mental Health/Wellbeing Terms) **w/200** Search Set 6 (Youth Terms)
 - a. Set 1 (working with IT on this one, think there may be syntax errors)
 - i. Marjorie – 0
 - ii. Scott – 0
 - iii. Both after Deconfliction – 0
 - b. Set 2
 - i. Marjorie – 3,075 (~5.92GB)
 - ii. Scott – 2,492 (~6.73GB)
 - iii. Both after Deconfliction – 4,889 (8.558GB)
 - c. Set 3
 - i. Marjorie – 2,429 (~5.51GB)

MDL 3047 – 2024-12-09 Agency Discovery JLB**Ohio – Meta Proposal****(Meta revised 12.11.2024)****Hit Report 12-13-2024**

- ii. Scott – 4,747 (~9.84GB)
 - iii. Both after Deconfliction – 5,944 (10.723GB)
- d. Set 4
 - i. Marjorie – 65 (~160.74MB)
 - ii. Scott – 210 (~1,022.12MB)
 - iii. Both after Deconfliction – 226 (0.657GB)
- e. Set 5
 - i. Marjorie – 35 (~124.11MB)
 - ii. Scott – 87 (~325.65MB)
 - iii. Both after Deconfliction – 106 (0.384GB)
- f. Set 6
 - i. Marjorie – 220 (~659.53MB)
 - ii. Scott – 308 (~1.48GB)
 - iii. Both after Deconfliction – 418 (1.28GB)
- g. Set 7
 - i. Marjorie – 668 (~1.72GB)
 - ii. Scott – 528 (~1.97GB)
 - iii. Both after Deconfliction – 1,024 (2.718GB)
- h. Set 8
 - i. Marjorie – 62 (~64.45MB)
 - ii. Scott – 44 (~126.85MB)
 - iii. Both after Deconfliction – 90 (0.154GB)
- i. Set 9
 - i. Marjorie – 445 (~1.85GB)
 - ii. Scott – 558 (~2.89GB)
 - iii. Both after Deconfliction – 815 (2.863GB)
- 5. [[Search Set 1 (Social Media Terms)] w/50 [Search Set 5 (Other Case Terms)]]
OR [[Search Set 6 (Youth Terms)] w/50 [(Search Set 5 (Other Case Terms)]]
 - a. Set 1
 - i. Marjorie – 35,112 (~23.96GB)
 - ii. Scott – 21,234 (~23.1GB)
 - iii. Both after Deconfliction

Search Set 1 – Social Media Terms

1.

(“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Netflix OR Reddit OR OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”)

MDL 3047 – 2024-12-09 Agency Discovery JLB**Ohio – Meta Proposal****(Meta revised 12.11.2024)****Hit Report 12-13-2024****Search Set 2 – Harm Terms**

	(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “adverse childhood experience” OR “adverse childhood experiences” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
2.	<p><i>Department of Mental Health and Addiction Services can omit the highlighted terms in String 2, but then run them separately against Search Set 6 and Search Set 3 as per the below:</i></p> <p><i>a) (wellness OR wellbeing OR well-being OR mental health OR treatment*) /25 Search Set 6 (Youth Terms)</i></p> <p><i>b) (wellness OR wellbeing OR well-being OR mental health OR treatment*) /25 Search Set 3 (Alternate Causation Terms)</i></p>

Search Set 3 – Alternate Causation Terms

5.	<p>(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR (“sex traff*))</p> <p><i>Department of Youth can omit String 5</i></p>
13.	(Covid* OR coronavirus OR pandemic OR quarantine OR “social* distanc*”)
14.	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia*)

MDL 3047 – 2024-12-09 Agency Discovery JLB**Ohio – Meta Proposal****(Meta revised 12.11.2024)****Hit Report 12-13-2024**

	OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)
--	--

Search Set 4 – Mental Health / Wellbeing Terms

3.	(“pro-ana” ((over OR excess*) w/3 diet*) OR anorexi* OR bulimi* OR orthorexi* OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*))
4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator*)
6.	(addic* OR dopamine OR rabbithol* OR “social reward” OR “social approval” OR “screen time” OR screentime OR timespent OR “time spent” “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9.	(negative w/3 (appearance OR experience OR affect* OR effect*))
10.	(compar* w/5 (appearance OR social OR other* OR negative))
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))

Search Set 5 – Other Case Terms

15.	(policy OR policies OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR legislator OR advocacy OR lobby* OR suspend* OR revok* OR fine* OR sanction* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)
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MDL 3047 – 2024-12-09 Agency Discovery JLB

Ohio – Meta Proposal

(Meta revised 12.11.2024)

Hit Report 12-13-2024

Search Set 6 – Youth Terms

16. (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)

Department of Education and the Workforce can omit the highlighted terms in String 16.

META LITIGATION HIT COUNTS

Search #	Orig Search	Orig AND "Social media"	Orig w/3 "Social media"	Orig w/5 "Social media"	Rerun Orig Search with 2015 timeframe
1	130,060	n/a	n/a	n/a	102,911
2	161,114		48,307	25	482
3	23,469		11,316	21	459
4	35,590		15,853	9	453
5	82,786			15	461
6	4,927			2	442
7	17			11	5
8	2			2	2
9	0			0	0
10	473			8	469
11	0			0	0
12	0			0	0
13	55,489			8	447
14	80,178			29	466
15	528,629			41	484
16	485,061			40	490
TOTALS	1,587,795			211	4,660
					1,331,547

** Search #1 is "Social media" terms

NOTE: The Department did not run all of the original searches with the "Social media" terms with AND as a connective

Orig w/3 "Social media" within 2015	Orig w/5 "Social media" within 2015	
n/a	n/a	
24	464	
21	446	
8	444	
13	450	
2	2	
11	5	
2	2	NOTE: Didn't run for w/5 and w/3 "Social Media"
0	0	NOTE: Didn't run for w/5 and w/3 "Social Media"
8	456	
0	0	NOTE: Didn't run for w/5 and w/3 "Social Media"
0	0	NOTE: Didn't run for w/5 and w/3 "Social Media"
7	447	
26	456	
39	466	
38	472	
199	4110	

ctor due to the volume of the first few searches.

META LITIGATION HIT COUNTS

Search #	Orig Search	Orig AND "Covid"	Orig w/5 "Covid"	Orig AND "Substance Abuse"
2	161,114	24,549	446	18,378
3	23,469	5,573	442	7,050
4	35,590	8,700	442	10,457
5	82,786	14,635	445	17,346
6	4,927	2,358	439	2,823
7	17	5 n/a		6
8	2	0 n/a		2
9	0 n/a	n/a		n/a
10	473	442	442	446
11	0 n/a	n/a		n/a
12	0 n/a	n/a		n/a
15	528,629	48,239	446	25,228
TOTALS	837,007	104,501	3,102	81,736

** Search # 13 is "Covid" terms

** Search # 14 is "Substance abuse" terms

NOTE: All searches were only run on emails and for the 2015 - present timeframe

Orig w/5 "Substance Abuse"
450
443
442
444
n/a
n/a
n/a
446
n/a
n/a
451
2,676

META LITIGATION HIT COUNTS - email 12/5/2024

		Search removing "education" terms	Search removing "education" terms and child*
Youth Use of Social Media:	6,436	5,375	3,985
Youth Harm:	101,837	84,525	52,801
Alternate Causation:			
Search #2 and #5	26,107		
Search #2 and #13	22,271		
Search #2 and #14	18,029		
Youth Mental Health/Wellbeing:			
Original Search #3	16,809	15,189	
Original Search #4	27,314		
Original Search #6	4,669		
**Original Search #7	17		
**Original Search #8	2		
**Original Search #9	0		
**Original Search #10	473		
**Original Search #11	0		
**Original Search #12	0		
*Other Case Issues:	0		
TOTALS:			

* I replaced "w/50" with NEAR(50) given the necessary terminology for Microsoft Purview

** For these I did not run the original search (i.e. just those initial terms) since they were already a

NOTE: These searches were run from 1/1/2015 - present

NOTE: These do not include deduping

Using NEAR(50) instead of AND	Using NEAR(25) instead of AND
659	295
75,811	65,354
10,640	7,991
8,692	6,503
7,749	6,509
11,269	10,005
20,999	18,930
803	603
17	17
2	2
0	0
473	473
0	0
0	0
0	0
137,114	116,682

	Total search as asked	Custodian #1 (JHM)	Custodian #2 (LS)	Custodian #3 (JS)
Social Media Terms	21,824	4,232	13,987	3,605
Youth Harm Terms	41,420	11,282	17,582	12,556

**Harm with Alternate
Causation**

#2 NEAR(200) #5	16,860	4,815	5,777	6,268
#2 NEAR(200) #13	13,913	3,966	5,288	4,659
#2 NEAR(200) #14	11,399	2,322	3,569	5,508

**Mental
Health/Wellbeing
with Youth**

* NOTE: Removed internal parenthetical from #3, otherwise

#3 NEAR(200) #16	6,973	2,328	2,082	2,563	resulted in 0 results
#4 NEAR(200) #16	9,032	2,762	3,260	3,010	
#6 NEAR(200) #16	8,116	2,765	2,111	3,240	
#7	17	5	11	1	*NOTE: When search run NEAR(200) #16 there are 0 results
#8	2	0	1	1	*NOTE: When search run NEAR(200) #16 there are 0 results
#9	0				
#10 NEAR(200) #16	8	0	8	0	
#11	0				
#12	0				
Other Case Terms	68,768	14,128	30,041	24,599	

** NOTE: All searches run from 1/1/2015 through present

Ohio Department of Children and Youth

12/16/2024 Hit Counts

Custodian Nicole Sillaman

1. Search Set 1 (Social Media Terms) w/200 Search Set 6 (Youth Terms) 37
2. Search Set 2 (Harm Terms) w/200 Search Set 6 (Youth Terms) 33902
3. Search Set 2 (Harm Terms) w/200 Search Set 3 (Alternate Causation Terms)
21216
4. Search Set 4 (Mental Health/Wellbeing Terms) w/200 Search Set 6 (Youth Terms) 0
5. [[Search Set 1 (Social Media Terms)] w/50 [Search Set 5 (Other Case Terms)]] OR [[Search
Set 6 (Youth Terms)] w/50 [(Search Set 5 (Other Case Terms)]] 117872

Ohio Department of Job and Family Services
12/16/2024 Hit Counts

1. Search 1 - 264 items (~1.52 GB)
2. Search 2 - 16,170 items (~119.89 GB)
3. Search 3 - 10,246 items (~93.51 GB)
4. Search 4 - 3,888 items (~38.63 GB)
5. Search 5 - 90,368 items (~247.28 GB)

Ohio Department of Mental Health and Addiction
12/16/2024 Hit Counts

1. Valerie Alloy Search Set #1 – asterisk not in quotes
 - a. 29,218 (~29.95 GB)
2. Valerie Alloy Search Set #1 – asterisk in quotes
 - a. 29,215 (~26.95 GB)
3. Valerie Alloy Search Set #2
 - a. 25,420 (~36.01 GB)
4. Valerie Alloy Search Set #3
 - a. 12,284 (~25.83 GB)
5. Valerie Alloy Search Set #4
 - a. 1 (~2.49 MB)
6. Valerie Alloy Search Set #5a
 - a. 13,891 (~19.78 GB)
7. Valerie Alloy Search Set #5b
 - a. 64,458 (~47.86 GB)